

**EXHIBIT A**



# EEO Complaint of Discrimination in the Postal Service

(See Instructions and Privacy Act Statement on Reverse)

1. Name <b>STANLEY BUMANI CRUMPTON</b>	2. SSN <b>203-44-2663</b>	3. Case No. <b>4-C-190-0035-02</b>
4a. Mailing Address - Street or PO Box <b>5 GREENFIELD DR.</b>	4b. City State & Zip +4 <b>New Castle DE 19720</b>	
5. Email Address* <b>CARRIER</b>	6. Home Phone <b>(302) 832-1342</b>	7. Work Phone <b>(215) 755-1510</b>
8. Position Title (USPS Employees Only) <b>CARRIER</b>	9. Grade Level (USPS Employees Only) <b>PS-06</b>	10. Do you have Veteran's Preference Eligibility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
11. Installation Where You Believe the Discrimination Occurred (Identify Installation, City, State, and Zip+4) <b>SCHUYLKILL STATION 2900 GRAYS FERRY AVE PHILA. PA. 19146</b>	12. Name and Title of Person(s) Who Took the Action(s) You Allege was Discriminatory <b>DANIEL Ash STATION MANAGER DANIEL Ash Dennis Carr AREA A MANAGER</b>	
13a. Name of Your Designated Representative <b>Anthony Johnson</b>	13b. Title <b>Shop Steward</b>	
13c. Mailing Address (Street or P.O. Box) <b>918 S 19th</b>	13d. City, State and Zip +4 <b>Phila Pa 19146</b>	
13e. Email Address*	13f. Home Phone <b>( )</b>	13g. Work Phone <b>(215) 755-1510</b>

\*Providing this information will authorize the U.S. Postal Service to send you important documents electronically.

## 14. Type of Discrimination You Are Alleging

- |   |  |
|---|--|
| <input type="checkbox"/> Race (Specify):            | <input type="checkbox"/> Sex (Specify):                    |
| <input type="checkbox"/> Color (Specify):           | <input type="checkbox"/> Age (40+) (Specify):              |
| <input type="checkbox"/> Religion (Specify):        | <input checked="" type="checkbox"/> Retaliation (Specify): |
| <input type="checkbox"/> National Origin (Specify): | <input type="checkbox"/> Disability (Specify):             |

## 15. Date on which alleged act(s) of Discrimination Took Place

16. Explain the specific action(s) or situation(s) that resulted in you alleging that you believe you were discriminated against (treated differently than other employees or applicants) because of your race, color, religion, sex, age (40+), national origin, or disability. **Note that if your allegation is like or related to a previous complaint, that complaint may be amended. 29 C.F.R. § 1614.106(d)**

SEE ATTACHMENT: Two pages  
REDRESS

JAN 20 2002

RECEIVED  
FBI/DOJ

Retaliation 4C-190-0001-02  
From manager DAN Ash.

Retaliation 4C-190-0115-01  
From AREA manager Dennis Carr.

## 17. What Remedy Are You Seeking to Resolve this Complaint?

AGENCY'S FINAL ACTION decision

18. Did You Discuss Your Complaint with a Dispute Resolution Specialist or a REDRESS™ mediator?

- ☒ Yes **January 9, 2002 By Certified Mail #70993400001513322702**  
☐ No

(Date You Received the Notice of Final Interview)

19a. Signature of Dispute Resolution Specialist

19b. Date

**1-9-02**

20. Signature of Complainant or Complainant's Attorney

21. Date of this Complaint

**1-23-02**



## Notice of Right to File Individual Complaint

TO: Name (First, MI, Last)

Re: Case No.

**STANLEY B. CRUMPTON**  
**BY CERTIFIED MAIL #70993400001513322702**

**4-C-190-0035-02**

This notice will attest to the fact that on January 9, 2002, I advised you of the actions taken concerning the alleged discrimination that you brought to my attention. If the matters that you raised during the pre-complaint processing stage have not been resolved, you have the right to file a formal complaint within 15 calendar days of the date you received this notice. If you decide to file a formal complaint, your complaint must be put in writing and signed by you or your attorney, if you retain one to represent you. I am providing you with **PS Form 2565, EEO Complaint of Discrimination in the Postal Service**, for this purpose. The complaint must be delivered to:

EEO COMPLAINT PROCESSING  
PO BOX 7571  
PHILADELPHIA PA. 19101-7571

JAN 28 2002

EEO COMPLAINT PROCESSING OFFICE  
PHILADELPHIA DISTRICT

Your complaint will be deemed timely filed if it is received at this address before the expiration of the 15-day filing period, or if it bears a postmark that is dated before the expiration of the filing period. In the absence of a legible postmark, it must be received by mail within 5 calendar days of the expiration of the filing period.

An EEO discrimination complaint can be processed only if the complainant alleges he or she has been discriminated against on the basis of race, color, religion, sex, age (40+), national origin, disability or retaliation for past EEO activity. In addition, courts have ruled the complainant has the burden of presenting evidence which would give rise to an inference of discrimination. A complaint must contain the following information:

(1) **Your name, address, position, and level;**

- If you change your address, you have a regulatory requirement to immediately report the change to the Manager, EEO Compliance and Appeals, in your area. (If you are employed at Postal Service Headquarters, a Headquarters Field Unit or by the Postal Inspection Service, you should notify the EEO Appeals Review Specialist at Postal Service Headquarters.)

(2) **The specific action or matter complained of, the date of occurrence, and the names of the official(s) who took the alleged discriminatory action at issue in this complaint;**

(3) **The specific type of discrimination alleged, e.g. race – African American, sex - female, etc.;**

- If you allege disability discrimination, the alleged disability must be more than a temporary condition.
- If you allege age discrimination, you must have been at least 40 years of age on the date the alleged discriminatory action occurred.

(4) **A brief statement of the facts that led you to believe you were discriminated against and the names of similarly situated individuals whom you believe were treated differently than you.**

- If you allege a failure to accommodate a disability or your religion, you must explain the accommodation sought and why you sought it.
- If you allege retaliation, you must show a connection between the action at issue in the complaint you are filing and your past EEO activity. You must also show that when the alleged discriminatory action at issue in this complaint occurred, the management who took the action was aware that you had previously engaged in protected activity.

(5) **The name of the EEO Dispute Resolution Specialist who provided you with this notice and the date you received this Notice of Right to File.**

### Privacy Act Notice

**Privacy Act Notice.** The collection of this information is authorized by The Equal Employment Opportunity Act of 1972, 42 U.S.C. § 2000e-16; The Age Discrimination in Employment Act of 1967, as amended, 29 U.S.C. 633a; the Rehabilitation Act of 1973, as amended, 29 U.S.C. § 794a; and Executive Order 11478, as amended. This information will be used to adjudicate complaints of alleged discrimination and to evaluate the effectiveness of the EEO program. As a routine use, this information may be disclosed to an appropriate government agency, domestic or foreign, for law enforcement purposes; where pertinent, in a legal proceeding to which to USPS is a party of has an interest; to a government agency in order to obtain information relevant to a USPS decision concerning employment, security clearances, contracts, licenses, grants, permits or other benefits; to a government agency upon its request when relevant to its decision concerning employment, security clearances, security or suitability investigations,

Contracts, licenses, grants or other benefits; to a congressional office at your request; to an expert, consultant, or other person under contract with the USPS to fulfill an agency function; to the Federal Records Center for storage; to the Office of Management and Budget for review of private relief legislation; to an independent certified public accountant during an official audit of USPS finances; to an investigator, administrative judge or complaints examiner appointed by the Equal Employment Opportunity Commission for investigation of a formal EEO complaint under 29 CFR 1614; to the Merit Systems Protection board or Office of Special Counsel for proceedings or investigations involving personnel practices and other matters within their jurisdiction; and to a labor organization as required by the National Labor Relations Act. Under the Privacy Act provision, the information requested is voluntary for the complainant, and for Postal Service employees and other witnesses.

Signature of Dispute Resolution Specialist 	Date 1-9-02	Your Signature 	Date Received 1-23-02
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Dispute Resolution Specialist: If you are mailing this Notice, you must send it by Certified Mail, Return Receipt Requested

Phone (302) 463-7057

January 7, 2002

Stanley Crumpton  
5 Greenfield Drive  
New Castle DE. 19027

Dear Postmaster: EEO Complaints Processing

On November 20, 2001 I came across a suspicious bottle with a white substance on it, inside of a L.C.B box at 35th Grays Ferry avenue. I immediately reported the incident to 204B Bridgett Bohannon.

On November 26, 2001 I was called into the office by area manager, Dennis Carr. He was extremely upset with me because I reported that a L.C.B box was possibly contaminated with Anthrax. There was a notice sent out to all postal employees, from Public Affairs and Communications in Washington D.C, stating that postal employees should not handle anything suspected of being contaminated with Anthrax. The notice then goes on to say report anything unusual to your supervisor

I followed every step that the notice said, and instead of getting a pat on the back, I was verbally disciplined. After all of the anthrax contamination inside of Postal facilities everyone including myself nerves were uneasy. I was perpetually on the look out for anything that could harm me, my co-workers, and the American public. Dennis Carr belittled me into thinking I did something wrong. Even though it was a false alarm, I don't regret reporting it. The only thing that I regret is that I work under someone who is cruel and thoughtless to his employees. The only thing I did was follow the steps given to me for a suspected contamination of anthrax. The only thing Dennis Carr achieved was to make me feel uneasy about reporting anything else. What if I actually do run into a real case of anthrax. I would probably be to afraid to report it because of Dennis Carr's unprofessional and insensitive behavior. Dennis Carr's ignorance should be dealt with. The only thing hes doing is makeing things worse then what they is. I really do want to keep myself and everyone else safe, but because of him I'm just not sure whats right anymore.

S. Bernare Crumpton  
Stanley Crumpton  
1-23-02

RECEIVED

JAN 28 2002

RECEIVED

JAN 28 2002

On 11-20-01; coworker Juanita Hayes as me did I shit in relay bag, I told her no. I ask Juanita Hayes why did she ask me that, she said that coworker was talking about you Shitting in relay bag. On 11-20-01. manager Dan Ash call me in his office to ask me did I shit in relay bag, I said no. Dan Ash told me that the postal inspector had been call in this matter. Dan Ash told me that D.N.A. sample will be taking from fascies. Dan Ash told me that he want me to confess. I told Dan Ash I have nothing to confess to, Dan Ash then ask me will I take a swathe test.

On 11-26-01. my immediate supervisor Kevin Mahoner told me manager Dan Ash wanted me to come in his office. I ask my shop steward Anthony Johnson to represent me he said ok. Manager Dan Ash continue to character assassination and demoralize me along with area manager Dennis Carr. Dennis Carr told me that "fascies was found in one of your relay bags that you deliver and I'm sick of this." I said "this is the fourth time some one shitted in the relay bag, what are the drummer for." Manager Dan Ash said. "We narrow it down to you this time, who else could done it." I been harass and slander from my manager Dan Ash and my arca manager Dennis Carr. I fill reprisal was there motivation.

Sincerely,  
STANLEY BOMANI CRUMPTON

*Stanley Bomani Crumpton*  
1-23-02

RECEIVED

JAN 28 2002

PHILADELPHIA DISTRICT OFFICE  
PHILADELPHIA DISTRICT

S.B. Leungston  
5 Greenfield Dr  
New Castle, De  
19720

CERTIFIED MAIL



7001 1140 0002 8973 0331



0000

19101

U.S. POSTAGE  
PAID  
PHILADELPHIA, PA  
JAN 23 1992  
AMOUNT

\$3.94  
00029279-10

RETURN RECEIPT  
REQUESTED

FEO COMPLAINTS PROCESSING

PO Box 7571

Phila. PA. 19101-7571

RECEIVED

JAN 23 1992

191017571 10

**EXHIBIT B**

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

STANLEY BOMANI CRUMPTON,

Plaintiff

v.

JOHN E. POTTER, Postmaster General,  
United States Postal Service,

Defendant.

CIVIL ACTION NO. 02-2873

**DECLARATION OF RICHARD TESZNER**

I, RICHARD TESZNER, declare under penalty of perjury as follows:

1. I am the Tort Claims Coordinator for the Philadelphia District of the United States Postal Service. Schuylkill Station is part of the Philadelphia District of the United States Postal Service.
2. I am responsible for handling all administrative claims filed under the Federal Tort Claims Act for alleged incidents occurring within the Philadelphia District.
3. At the request of counsel, I reviewed my claim files dating back to November 2001 with regard to any and all claims filed by Stanley Bomani Crumpton, social security number 203-44-2663.
4. I was unable to locate a single claim filed by Mr. Crumpton.



I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that to the best of my knowledge, information and belief that the above statements are true and correct.

EXECUTED this 31 day of July 2002.



RICHARD TESZNER  
Tort Claims Coordinator  
Philadelphia District  
United States Postal Service